

UNITED STATES DISTRICT COURT
FOR THE
DISTRICT OF MASSACHUSETTS

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DR. ROBERT LEDERER,
Plaintiff,

v.

JOHN SNOW, INC. and
THE JOHN HOPKINS UNIVERSITY/
CENTER FOR COMMUNICATION
PROGRAM,
Defendants.

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CIVIL ACTION NO.
04-10284-NG

JOINT STATEMENT PURSUANT TO LOCAL RULE 16.1(D)

A. STATUS OF THE CASE

Discovery in this matter is complete, with the exception of the deposition of Johns Hopkins University. Despite the parties best efforts and due to a variety of scheduling reasons, the deposition has not yet taken place.

B. REMAINING PRETRIAL SCHEDULING

The parties request the Court issue dates for the following activities:

Motions for Summary Judgment

Oppositions to Motions for Summary Judgment

Reply Memorandum to Oppositions

Hearing on Motions for Summary Judgment

C. ALTERNATIVE DISPUTE RESOLUTION

The parties do not feel ADR is an option in this case.

D. TRIAL

The parties consent to try this matter before Magistrate Judge Judith Gail Dein.

**The Plaintiff,
By his attorney**

/s/ David B. Stein

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**Johns Hopkins University/
Center for Communication Programs,
By their attorney,**

/s/ John F. Rooney, III

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**John Snow, Inc.
By their attorney,**

/s/ Andrew F. Caplan

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Dated: May 18, 2005